

**UNITED STATES DISTRICT COURT
DISTRICT OF DELAWARE**

CD INTELLECTUAL PROPERTY)	
HOLDINGS, LLC)	
)	
Plaintiff,)	
)	Civil Action No. 05-414-JJF
)	
)	
AMAZON.COM, INC.,)	
)	
Defendant.)	

NOTICE OF 30(b)(6) DEPOSITION OF AMAZON.COM, INC.

PLEASE TAKE NOTICE THAT pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, commencing at 9:00 a.m. on March 8, 2006, or at such other date and time as shall be agreed upon by the parties or ordered by the Court, and continuing time to time thereafter, Plaintiff CD Intellectual Property Holdings, LLC will take the deposition upon oral examination of a representative or representatives of Amazon.com, Inc. concerning the subjects identified in Schedule A, attached. Please designate a representative or representatives at least ten business days prior to the deposition. The deposition shall take place at the offices of Ashby & Geddes, 222 Delaware Avenue, 17th Floor, Wilmington, Delaware 19899 or at such location as agreed to by the parties or as ordered by the Court. The deposition will be taken before an officer authorized by law to administer oaths, and will be recorded by stenographic and/or audiovisual means. You are invited to attend and cross-examine.

ASHBY & GEDDES

/s/ Tiffany Geyer Lydon

Steven J. Balick (I.D. #2403)
John G. Day (I.D. #2114)
Tiffany Geyer Lydon (I.D. #3950)
222 Delaware Avenue, 17th Floor
P.O. Box 1150
Wilmington, Delaware 19899
(302) 654-1888
sbalick@ashby-geddes.com
jday@ashby-geddes.com
tlydon@ashby-geddes.com

Attorneys for Plaintiff

Of Counsel:

Steven Lieberman
Elizabeth A. Leff
Brian Rosenbloom
C. Nichole Gifford
Rothwell, Figg, Ernst & Manbeck, P.C.
1425 K Street, N.W.
Suite 800
Washington, D.C. 20005
(202) 783-6040

Date: February 15, 2006

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SCHEDULE A

DEFINITIONS

CD incorporates herein the definitions from Cendant's First Set of Requests for the production of documents.

The term "customer purchase information" means any information and/or data related to a purchase made by a customer from Amazon.

TOPICS FOR TESTIMONY

1. Any method, system or process or product developed, implemented or used on the Amazon.com website for making a recommendation, including but not limited to the manner in which a recommendation is made, the customer act which triggers the recommendation or the revision of a recommendation, the date each method, system or process or product was first implemented and whether it is currently being used.
2. The design, development, implementation, operation, functionality and/or attributes of each Amazon.com customer recommendation feature.
3. The manner in which Amazon.com determines the effectiveness of each customer recommendation feature including but not limited to the criteria considered and the evaluation of that criteria.
4. For each customer recommendation feature ever implemented, the method by which Amazon determines (or could determine) whether a purchase was made as a result of a recommendation from Amazon.
5. The uses Amazon makes of its customer purchase information.

6. How Amazon collects and stores customer purchase information.
7. The date of conception, reduction to practice, and date of first public use of each customer recommendation feature by Amazon.

CERTIFICATE OF SERVICE

I hereby certify that on the 15th day of February, 2006, the attached **NOTICE OF 30(b)(6) DEPOSITION OF AMAZON.COM, INC.** was served upon the below-named counsel of record at the address and in the manner indicated:

John W. Shaw, Esquire
Young Conaway Stargatt & Taylor
The Brandywine Building
1000 West Street, 17th Floor
Wilmington, DE 19801

HAND DELIVERY

Lynn H. Pasahow, Esquire
Fenwick & West, LLP
Silicon Valley Center
801 California Street
Mountain View, CA 94041

VIA FEDERAL EXPRESS

/s/ Tiffany Geyer Lydon

Tiffany Geyer Lydon